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July 7, 2025

Hon. Margaret M. Garnett  
Thurgood Marshall United States Courthouse  
Courtroom 906  
40 Foley Square  
New York, NY 10007

Re: *Pro Publica, Inc. v. United States Department of State*, Case No. 1:25-cv-04302-MMG –  
Joint Letter Regarding Case Status

Dear Judge Garnett:

Pro Publica, Inc. (“Plaintiff”) and the United States Department of State (“State”), through their respective counsel, jointly submit this letter to apprise the Court of the status of this case, brought under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552.

Counsel for the parties met and conferred on July 3 and 7 in advance of the upcoming July 8 Initial Pretrial Conference, including to clarify the scope of the FOIA request. State has informed Plaintiff that it has located no records responsive to the first part of the FOIA request, and that its searches for records responsive to the second part of the FOIA request (whose scope has been clarified in the parties’ discussions) are ongoing. State is not yet able to estimate a date for the completion of these searches. The parties respectfully propose that they submit monthly status reports to the Court regarding State’s searches and productions. Should any disagreements arise between the parties, they will try to resolve them informally, and if they are unable to do so, will propose a briefing schedule.

We are glad to provide the Court any additional information. Thank you for Your Honor’s attention to this matter.

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Respectfully,

/s/ James Rosenfeld

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